

Stakeholder Comments on: The CAISO's Business Process Manual for CRRs

Submitted by (Name and phone number)	Company or Entity	Date Submitted
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Southern California Edison Company (SCE) hereby submits its initial comments on the California Independent System Operator's (CAISO) September 15, 2008 CRR Outage Coordination 30-Day Rule Workshop and draft Business Process Manual (BPM) for Outage Management (Version 4) dated September 6, 2008.

I. Introduction

SCE appreciates the opportunity to comment on the CAISO's draft workshop and thanks the CAISO for holding the workshop. Below are SCE's specific comments to the CAISO's draft BPM language:

II. Language in Draft Version 4 of the ISO BPM for Outage Management Section 4.2.1.1 (p 4-4) Needs to be Updated

It appears that the Outage Management BPM Section 4.2.1.1 starting at page 4-3 has not be fully updated from "a single calendar day" language to " a 24-hour period". SCE believes this is an oversight. Section 4.2.1.1 starting at the bottom of 4-3 is provided below in italics:

The CAISO will apply the "30-day rule" for scheduling planned outages of Significant Facilities. Under the 30-day rule, requests for planned outages of Significant Facilities must be submitted to CAISO Outage Coordination at least 30 days prior to the start of the calendar month for which CAISO Business Practice Manual BPM for Outage Management the outage is planned to begin. This rule is intended to provide good outage data far enough in advance to allow the CAISO to reflect them in the network model used for releasing CRRs and thereby minimize impacts to the revenue adequacy of CRRs.

The CAISO emphasizes that the 30-day rule is not intended to prevent needed maintenance on significant facilities in circumstances where the 30-day rule cannot be followed without adversely affecting the grid reliability. Accordingly, the following exceptions to the 30-day rule will be used to approve outages without classifying them as forced:

1. Outages that are less than 24 hours in duration **beginning and ending entirely within a single calendar day**.
2. Outages previously approved by CAISO that are moved within the same calendar month either by the CAISO or by request of the PTO.
3. CAISO approved allowable transmission maintenance activities during restricted maintenance operations as covered in CAISO operating procedure E-509A.
4. The most current list of specific Significant Transmission Equipment will be covered in CAISO operating procedure T-113.

The CAISO will review the history of these types of exceptions annually to determine whether they are effective in promoting adequate information for CRR purposes, and whether use of these exceptions should continue to be classified as planned.

SCE proposes to update # 1 above as follows:

1. Outages that are less than 24 hours in duration

Deleted: beginning and ending entirely within a single calendar day.

SCE notes this updated language would be consistent with the CRR BPM updates in Section 10.3.1

ISO BPM for Outage Management Section 4.14

SCE is not sure whether it is open for discussion; however, Section 4.14 doesn't seem to fit, even in the context of Sections 4.12 and 4.13.

III. Conclusion:

Given that the recent stakeholder efforts and efforts by the CAISO, SCE believes the language update proposed above is an oversight and requests the CAISO to accordingly update the Outage Management BPM. Also, SCE request the CAISO reconsideration of Section 4.14.